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16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA

18
19 GALE SOSTEK; and HERB SOSTEK,

Plaintiff,

20 vs.

21 COUNTY OF SAN BERNARDINO;
22 SAMUEL FULLER; and DOES 2-10,
inclusive

23 Defendants.

Case No. 5:23-cv-02236-MRA-MRW
Magistrate Judge Michael R. Wilner

**JOINT STIPULATION FOR
ORDER EXTENDING DISCOVERY
DEADLINES**

[Proposed] Order *filed concurrently
herewith*

1 IT IS HEREBY STIPULATED AND REQUESTED by and between the
2 parties hereto, through their attorneys of record, as follows:

3 1. Substantial discovery has been conducted in this matter. The parties
4 and propounded and responded to written discovery and subpoenas have been
5 served on third parties.

6 2. The parties had been in discussions regarding settlement and agreed to
7 postpone expert depositions until after December 17, 2024.

8 3. The case presently has approaching deadlines, per the Civil Pretrial
9 Schedule and Trial Order [Doc. #22], [Doc. # 42], and the Order regarding the Joint
10 Stipulation to Extend Discovery Deadlines for Rebuttal Expert Disclosures and
11 Expert Discovery Cut-off [Doc. #61].

12 4. In order to schedule the depositions of the parties and promote the
13 prospects for success of settlement discussions, the parties request that the pending
14 controlling deadlines for Expert Discovery Cut Off and Last Day to Hear Daubert
15 Motions.

16 5. Such request, if granted, would result in the following schedule:

<u>EVENT</u>	<u>CURRENT</u>	<u>PROPOSED</u>
Expert Discovery Cut Off:	12/6/24	12/20/24
Last Date to <u>Hear</u> <i>Daubert</i> Motions:	12/13/24	1/8/2025

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22 7. All other pre-trial and trial dates would remain in effect.
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1 IT IS SO STIPULATED AND REQUESTED.
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4 DATED: December 9, 2024

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6 By /s/Michelle R. Prescott
Attorneys for Defendants
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8 DATED: December 9, 2024

LAW OFFICES OF DALE K. GALIPO

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10 By /s/ Eric Valenzuela
Eric Valenzuela
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